

UNITED STATES DISTRICT COURT
OF MASSACHUSETTS (Boston)

FILED
IN CLERKS OFFICE

2019 APR -8 PM 1:05 Case #

19-10671

Emmanuel EVARISTE

v.

U.S. DISTRICT COURT
DISTRICT OF MASS.

Bristol County SHERIFF'S OFFICE

COMPLAINT

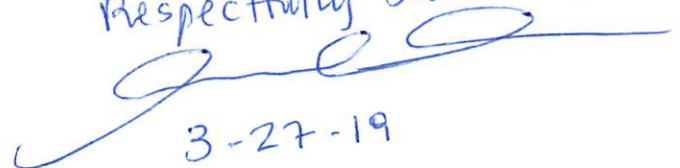
HERE COMES the plaintiff EVARISTE with a complaint against the defendant Bristol County SHERIFF'S OFFICE for 2 incidents of PREA. that the first incident of PREA occurred at South Bay House of Corrections while the plaintiff was in the custody of Bristol County Sheriff's office being transported to Boston Immigration Court. The plaintiff is an ICE detainee being housed at Bristol County Jail. ICE detainees are transferred to South Bay Jail on their way to Boston Immigration Court. ON MARCH 7th, 2019, approximately 8am an inmate approached the plaintiff EVARISTE and demanded to perform an oral sex act on the plaintiff. The plaintiff secured himself from the inmate and quickly notified prison officials of the incident. The plaintiff and the inmate were placed in segregated cells. The plaintiff was later released in population while the inmate was placed in segregated Unit when they were both returned to Bristol County Jail. On March 27th, 2019, the perpetrator inmate was being placed in the plaintiff's cell in Unit 2 East of population. The plaintiff quickly notified the Correctional officer on duty, but Correctional officer VELEZ called the cert team and had the plaintiff EVARISTE handcuffed and taken to Seg when the plaintiff was the clear victim in the situation.

Bristol County correction officers violated the PREA which is an act passed by congress to protect inmate in custody, from repeated offenses by PREA offenders. The officer velez knowingly aware of offender inmate history and purposely placed him in the plaintiff's cell on March 27th, 2019 in Unit 2 East Room 252.

Bristol County sheriff's office officials were grossly negligent in allowing this offender inmate to be placed back in population after a prior PREA offense. Bristol County sheriff's office officials violated the plaintiff's Evarest civil rights by handcuffing and placing the plaintiff in segregation for reporting a PREA offender being placed in his cell.

The plaintiff Evarest was a victim of PREA in the custody of Bristol County sheriff's office. The plaintiff suffered from excessive trauma and mental anguish. The plaintiff suffered from serious emotional distress and has become mentally unfit to remain in custody. The plaintiff is seeking \$10 million in judgment.

Respectfully Submitted



3-27-19